

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

09 SEP -1 P3 01

UNITED STATES OF AMERICA,

Plaintiff,

v.

JON W. SANFILIPPO
CLERK

Case No. 09-CR-

09 CR-208

[18 U.S.C. §§ 1343 (Wire Fraud), 1344
(Bank Fraud)]

ERIC HILL and
BRIAN BOWLING,

Defendants.

INDICTMENT

ALLEGATIONS COMMON TO ALL COUNTS

THE GRAND JURY CHARGES:

1. In approximately September and October 2004, in the State and Eastern District of Wisconsin, and elsewhere, the defendants,

**ERIC HILL and
BRIAN BOWLING,**

and others did knowingly devise and participate in a scheme to obtain money by means of material false and fraudulent pretenses and representations.

2. At all times material to this indictment:

- a. Eric Hill represented himself to be a mortgage broker/loan originator working from an office at his home, located at 44XX County Line Road, Mequon, Wisconsin;

- b. Brian Bowling represented himself to be the president and CEO of Platinum Concepts, a mortgage brokerage business, located in Madison, Wisconsin.

The Scheme

- 3. The scheme was essentially as follows:
 - a. Eric Hill enlisted Douglas L. Gray, Jr., to pose as a man named L.J. for the purpose of obtaining multiple loans, including residential loans on the property which Hill owned at 44XX West County Line Road, Mequon, Wisconsin, and several personal loans.
 - b. In connection with the various loan applications, Gray assumed the identity of L.J., telling others that he was L.J., and presenting fake identification bearing L.J.'s name, including a fake Wisconsin Driver's license bearing Gray's picture and the name L.J., and a counterfeit Social Security card, bearing the name and forged signature of L.J.
 - c. Hill and Gray arranged for the production of false documents which were submitted in connection with the applications for the residential loans, including documents which falsely stated L.J.'s employment and income;
 - d. Brian Bowling participated in the scheme by arranging to broker mortgage loans through Platinum Concepts in L.J.'s name, knowing that Gray would be signing the mortgage documents as L.J. The mortgage loans were for the purchase and refinance of Hill's residence at 44XX County Line Road, Mequon, Wisconsin.
 - e. Hill further arranged to obtain several personal loans in the name L.J. by introducing Gray as L.J. and vouching for him to various financial officers of lending institutions.
 - f. As the result of this scheme, more than \$700,000 in loan proceeds were disbursed by at least four separate lenders.

Executions of the Scheme

THE GRAND JURY FURTHER CHARGES:

Wire Fraud

4. On or about the dates indicated below, in the State and Eastern District of Wisconsin,

**ERIC HILL and
BRIAN BOWLING,**

and others knowingly executed the scheme by causing to be transmitted by means of wire communication in interstate commerce signs, signals, pictures and sounds which accomplished the wire transfer of loan funds as follows:

| <u>Count</u> | <u>Date</u> | <u>Description of Execution</u> |
|---------------------|--------------------|--|
| One | 10/4/04 | The wire transfer of \$650,296.26 from the account of National City Mortgage Company at National City Bank, Cleveland, Ohio to the escrow account of Metropolitan Title Company at M&I Bank, Milwaukee, Wisconsin. |
| Two | 10/4/04 | The wire transfer of \$80,779.00 from the account of National City Corp-National Home Equity at National City Bank, Cleveland, Ohio to the escrow account of Metropolitan Title Company at M&I Bank, Milwaukee, Wisconsin. |

All in violation of Title 18, United States Code, Sections 1343 and 2.

THE GRAND JURY FURTHER CHARGES:

Bank Fraud

5. On or about the dates indicated below, in the State and Eastern District of Wisconsin,

ERIC HILL,

and others knowingly executed the scheme to obtain moneys under the custody and control of a financial institution through bank transactions as follows:

| <u>Count</u> | <u>Date</u> | <u>Description of Execution</u> |
|--------------|-------------|---|
| Three | 10/5/04 | Procurement of an unsecured personal loan of \$25,000 from Bank Mutual, 208 N. Main Street, Thiensville, Wisconsin, based on the fraudulent representation that Douglas Gray was L.J. The deposits of Bank Mutual are insured by the Federal Deposit Insurance Corporation. |
| Four | 10/8/04 | Procurement of an unsecured personal loan of \$6,000 from US Bank, 4200 West Brown Deer Road, Brown Deer Wisconsin, based on the fraudulent representation that Douglas Gray was L.J. The deposits of US Bank are insured by the Federal Deposit Insurance Corporation. |

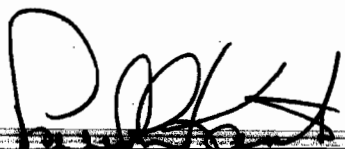
All in violation of Title 18, United States Code, Sections 1344 and 2.

A TRUE BILL:

FOREPERSON

Dated:

Sept 1, 2009


MICHELLE L. JACOB
United States Attorney